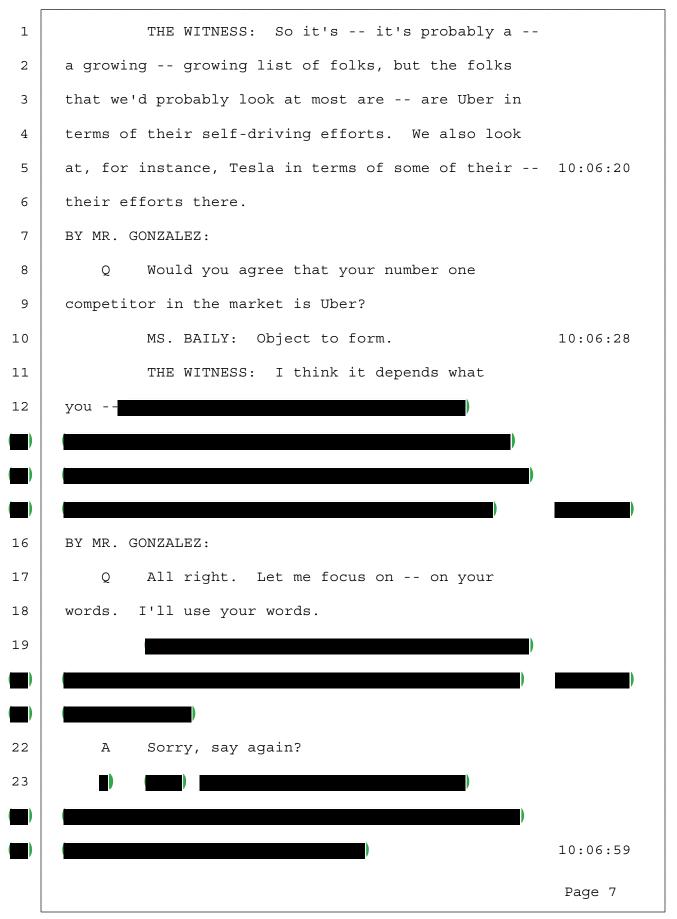
# EXHIBIT 12 FILED UNDER SEAL

### Case 3:17-cv-00939-WHA Document 589-8 Filed 06/12/17 Page 2 of 9 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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1
                UNITED STATES DISTRICT COURT
 2
               NORTHERN DISTRICT OF CALIFORNIA
                   SAN FRANCISCO DIVISION
 3
 4
 5
      WAYMO LLC,
                     Plaintiff,
 6
 7
                                    ) Case No.
              VS.
      UBER TECHNOLOGIES, INC., ) 3:17-cv-00939-WHA
 8
 9
      OTTOMOTTO LLC; OTTO
                                     )
      TRUCKING LLC,
10
                     Defendants.
11
12
          HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
13
14
15
             VIDEOTAPED DEPOSITION OF DANIEL CHU
                  San Francisco, California
16
17
                    Monday, April 3, 2017
18
                          Volume I
19
20
     Reported by:
21
     SUZANNE F. GUDELJ, CSR No. 5111
22
23
     Job No. 2583707
24
     PAGES 1 - 53
25
                                                   Page 1
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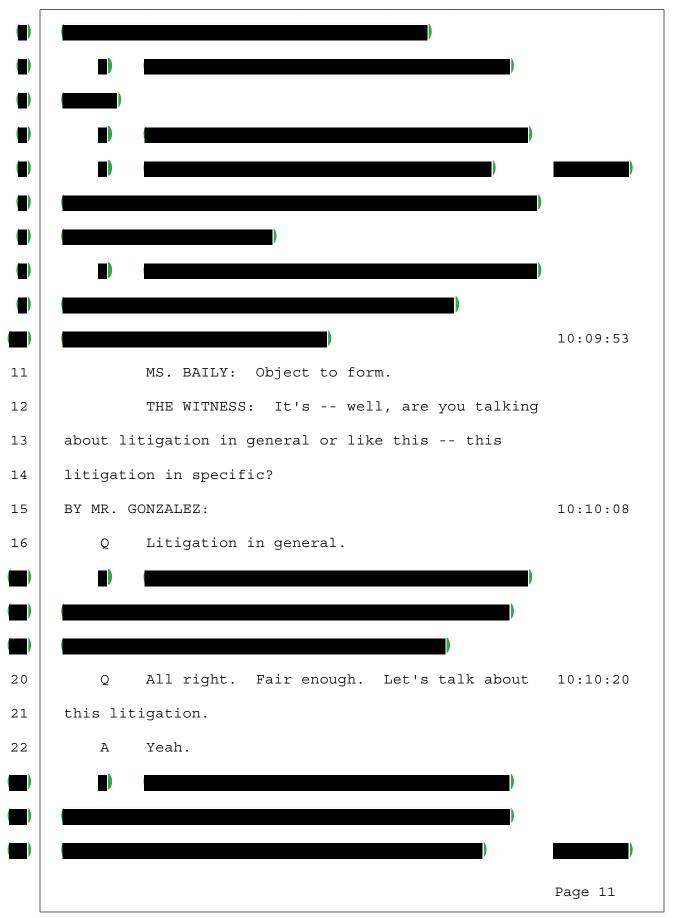
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5		MS. BAILY: Object to form.	10:07:09
6		THE WITNESS:	
8	BY MR. (	GONZALEZ:	
9	Q	Would you agree that it's your number one	
LO	competit	tor in that space?	10:07:18
L1		MS. BAILY: Object to form.	
.2	BY MR. (	GONZALEZ:	
.3	Q	I'm not trying to trap you.	
.4	А	Yeah.	
.5	Q	If somebody else is number one, I want to	10:07:20
.6	know, th	nat's all.	
7	А	Yeah.	
.8	Q	So let me go back.	
L9			
			10:07:26
21		MS. BAILY: Same objection.	
22		THE WITNESS:	
24	BY MR. (	GONZALEZ:	
25	Q	And who would you consider to be number	10:07:33
			Page 8

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1	basically my user research team does the surveys.	
2	BY MR. GONZALEZ:	
3	Q And your research team is to have does	
4	it have a name?	
5	A They they basically just called it the	10:08:38
6	user research group, yeah.	
7	Q User research group?	
8	A Yeah.	
9	Q Not Daniel's brigade or anything like that?	
10	A No.	10:08:49
11	Q All right.	
14	A I don't remember the exact date.	
15	Q Approximately.	10:08:58
16	A But approximately, we've done probably in	
17	the last I'm trying to remember I mean, last	
18	few months, but it's been more focused on the	
19	markets that we're interested in, yeah.	
20	Q And what markets are those that you were	10:09:13
21	more focused on?	
		10:09:24
		Page 10

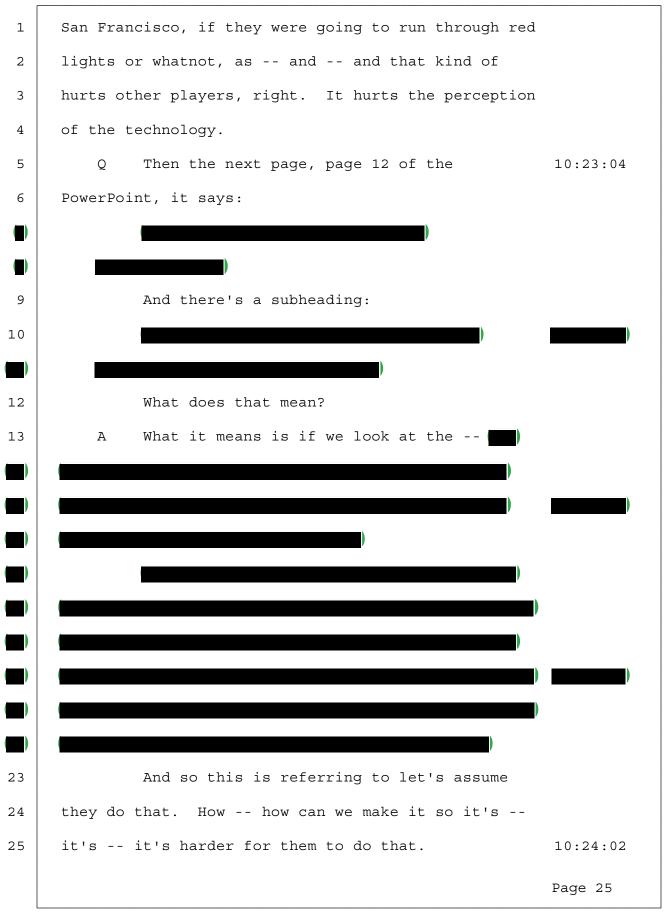
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2	MS. BAILY: Object to form.		
3	THE WITNESS:		
8	BY MR. GONZALEZ:		
9	Q Do you ever have communications with public		
10	agencies about your vehicles?	10:10:51	
11	A Do		
12	MS. BAILY: Object to form.		
13	THE WITNESS: Do I personally or		
14	BY MR. GONZALEZ:		
15	Q Yes, you.	10:10:57	
16	A Most of my efforts are more internal		
17	focused.		
18	Q Who at Waymo is the person who communicates		
19	with public agencies to try to get approval for you		
20	to be able to drive your autonomous vehicles there?	10:11:08	
21	A It's probably going to be more of our		
22	public policy team and our partnership teams.		
23	Q And who are the people who are in charge of		
24	those groups?		
25	A So I'm trying to think. So Kevin Vosen,	10:11:20	
		Page 12	

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1	of billions of dollars?	
2	MS. BAILY: Object to form.	
3	THE WITNESS: You're saying in general or	
4	you're saying for particular like I just want to	
5	make sure I'm answering the question correctly.	10:40:59
6	BY MR. GONZALEZ:	
7	Q That's fair.	
8	A Yeah.	
10	A Okay.	10:41:04
11	Q Would you agree that the ride-sharing	
12	market for autonomous vehicles is likely to be in	
13	the hundreds of billions of dollars?	
14	MS. BAILY: Object to form.	
15	THE WITNESS: I think it's it's	10:41:17
16	definitely possible that in the in the	
17	ride-sharing market alone for self-driving cars on a	
18	global basis that it will be in the hundreds of	
19	billions of dollars, that's correct.	
20	BY MR. GONZALEZ:	10:41:33
21	Q Let me show you a document we've marked as	
22	1033.	
23	(Defendant Exhibit 1033 marked by the court	
24	reporter.)	
25	BY MR. GONZALEZ:	10:41:39
		Page 40